REMARKS

Status Of Application

Claims 1-20 were pending in the application; the status of the claims is as follows:

Claims 1-20 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,891,643 B1 to Matsuda ("Matsuda '643").

Claims 21-24 have been added.

Claims 3, 4, 15, and 16 are being canceled without prejudice.

Claim Amendments

Claims 1, 5, and 9 have been amended to more particularly point out and distinctly claim the subject matter of the invention. Support for the amendments may be found in the specification at paragraphs [0045]-[0063].

Claims 6, 7, and 11 have been amended to remain consistent with their corresponding parent claims and claim 17 has been amended to correct a typographical error.

New claims 21-24 have been added.

These changes do not introduce any new matter.

35 U.S.C. § 102(e) Rejection

The rejection of claims 1-20 under 35 U.S.C. § 102(b) as being anticipated by Matsuda '643, is respectfully traversed based on the following.

The present invention contemplates that due to manufacturing tolerance, equipment aging, etc., there may be a difference between the actual and desired positions of the scanning mechanism when an image of a portion of a document is captured. To accommodate this effect, a device according to the present invention determines a difference between the actual and desired positions of the scanning mechanism for each image and adjusts the captured image based on the difference. The captured images are then combined to form a final image.

These aspects of the present invention are apparent in amended claim 1, which recites a method comprising, *inter alia*, steps of:

> "detecting a difference between an actual stop position of the scanning mechanism and a normal stop position when shooting a split image;
> converting an address of each split image to a normal address based on the detected difference for each split image; and
> connecting each split image in order to complete an image of the original based on the converted normal address of each split image, ..."

That is, the difference or error in the position of the scanning mechanism is determined, the individual images are corrected based on the detected position error, and then the images are combined.

It is respectfully submitted that the subject matter of claim 1 is not disclose, taught, or otherwise suggested by Matsuda. Indeed, Matsuda does not even disclose that the actual stopping position of the scanning mechanism may differ from a desired stopping position, and therefore, has no need to disclose detecting, or correcting for, any such difference. Matsuda fails to disclose all features of claim 1. Accordingly, Matsuda is distinguished by claim 1, as well as by claims 2, 12-14, and 21 which depend therefrom.

Claim 5 has been amended to recites a method comprising, *inter alia*, steps of:

> "detecting an amount by which each actual stop position of the scanning mechanism is shifted from a normal stop position of the scanning mechanism" and

> "connecting the split images responsive to the detected shift amounts"

That is, claim 5 requires that the difference or error in the position of the scanning mechanism be determined and that the individual images be connected based on the detected position error. As provided above in respect of claim 1, it is respectfully submitted that Matsuda fails to disclose these features of amended claim 5. Accordingly, Matsuda is distinguished by claim 5, as well as by claims 6-8, 17, and 22 which depend therefrom.

Claim 9 has been amended to recite apparatus comprising, *inter alia*, steps of:

> "a detector which detects, every time the mechanism moves the directing member, a difference between an actual stop position of the directing member and a normal position of the directing member; and
>
> a processor which connects the split images in consideration of the detected difference to thereby complete an image of the entire original"

That is, claim 9 requires that the difference or error in the position of the directing member be determined and that the individual split images be connected based on the detected difference. As provided above in respect of claim 1, it is respectfully submitted that Matsuda fails to disclose these features of amended claim 9. Accordingly, Matsuda is distinguished by claim 9, as well as by claims 10-11, 18-20, and 23 which depend therefrom.

Accordingly, it is respectfully requested that the rejection of claims 1-20 under 35 U.S.C. § 102(e) as being anticipated by Matsuda '643, be reconsidered and withdrawn.

CONCLUSION

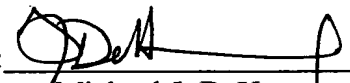
Wherefore, in view of the foregoing amendments and remarks, this application is considered to be in condition for allowance, and an early reconsideration and a Notice of Allowance are earnestly solicited.

This Amendment does not increase the number of independent claims, does not increase the total number of claims, and does not present any multiple dependency claims. Accordingly, no fee based on the number or type of claims is currently due. However, if a fee, other than the issue fee, is due, please charge this fee to Sidley Austin LLP Deposit Account No. 18-1260.

If an extension of time is required to enable this document to be timely filed and there is no separate Petition for Extension of Time filed herewith, this document is to be construed as also constituting a Petition for Extension of Time Under 37 C.F.R. § 1.136(a) for a period of time sufficient to enable this document to be timely filed.

Any other fee required for such Petition for Extension of Time and any other fee required by this document pursuant to 37 C.F.R. §§ 1.16 and 1.17, other than the issue fee, and not submitted herewith should be charged to Sidley Austin LLP Deposit Account No. 18-1260. Any refund should be credited to the same account.

Respectfully submitted,

By: 

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